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December 12, 2008

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By ECF

Magistrate Judge E. Thomas Boyle
United States District Court
100 Federal Plaza
Central Islip, New York 11722

Re: *In Re: American Home Mortgage Securities Litigation*, 2:07-md-01898-TCP-ETB

Dear Magistrate Judge Boyle:

On behalf of all parties, we write to request an adjournment of the initial scheduling conference in the above-captioned matter, pending resolution of Defendants' motions to dismiss. The initial scheduling conference is currently scheduled to be held before your Honor on Monday, December 15, 2008. We make this request for an adjournment with the consent of all parties.

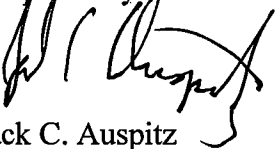
On November 13, 2008, the parties filed a stipulation with Judge Platt, a copy of which is enclosed herewith. Pursuant to the stipulation, the parties agreed that Plaintiffs shall serve on Defendants an omnibus memorandum in opposition to Defendants' motions to dismiss by today, and Defendants shall serve on Plaintiffs their reply to Plaintiffs' opposition by January 23, 2009. The stipulation provided that the December 15, 2008, Initial Scheduling Conference before your Honor should be adjourned pending resolution of Defendants' motions to dismiss the Complaint.

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In light of the briefing schedule in this matter and pending resolution of Defendants' motions to dismiss, we respectfully request an adjournment of the initial scheduling conference currently scheduled for December 15, 2008.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Jack C. Auspitz", is written over the text "Respectfully Submitted,".

Jack C. Auspitz

Enclosure

cc: All counsel of record (by electronic mail)

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IN RE AMERICAN HOME MORTGAGE
SECURITIES LITIGATION

) 07-MD-1898 (TCP)
)

THIS DOCUMENT RELATES TO
ALL CLASS ACTIONS

) Electronically filed
)
)

[STIPULATION] AND PROPOSED SCHEDULING ORDER

Lead Plaintiffs, the Teachers' Retirement System of Oklahoma ("Oklahoma Teachers") and the Oklahoma Police Pension and Retirement System ("Oklahoma Police"), and Plaintiffs Dana Marlin, Ilene Karol and Lindy Mika (collectively with Lead Plaintiffs, "Plaintiffs") and Defendants Michael Strauss, Stephen Hozie, Robert Bernstein, Michael A. McManus, Jr., C. Cathleen Raffaeli, Kristian R. Salovaara, Nicholas R. Marfino, Kenneth P. Slosser, Irving J. Thau, John A. Johnston, Citigroup Global Markets, Inc., Citigroup, Inc., Lehman Brothers, Inc., J.P. Morgan Chase & Co., Deutsche Bank Securities, Inc., Deutsche Bank AG, Stifel, Nicolaus & Company, Inc., Ryan Beck & Co., Inc. and Deloitte & Touche LLP (collectively, "Defendants")¹ by and through their respective undersigned counsel, hereby stipulate, subject to Court approval, as follows, concerning the schedule for briefing on Defendants' motions to dismiss the Consolidated Amended Class Action Complaint (the "Complaint").

RECITALS

WHEREAS, on June 3, 2008, Plaintiffs filed the Complaint;

WHEREAS, on September 12, 2008, Defendants served on Plaintiffs seven motions to dismiss the Complaint;

WHEREAS, pursuant to the parties' Stipulation, so ordered by the Court on August 5, 2008, Plaintiffs' memoranda in opposition to Defendants' motions to dismiss are due to be served on Defendants by November 14, 2008 and Defendants' reply memoranda are due to be served on Plaintiffs by December 4, 2008;

WHEREAS, Plaintiffs require a brief extension of the time permitted to respond to Defendants' seven motions;

WHEREAS, Defendants have consented to Plaintiffs' request for an extension;

¹ One named defendant that has not appeared in this action has not joined in this Stipulation. Specifically, defendant Flagstone Securities LLC has not been served and appears to be defunct.

WHEREAS, there have been no previous extensions to Plaintiffs' time to oppose Defendants' motions to dismiss; and,

WHEREAS, pursuant to Magistrate Judge Boyle's October 8, 2008 Order, an Initial Scheduling Conference before Magistrate Judge Boyle is scheduled to be held on December 15, 2008;

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by Plaintiffs and Defendants, through their respective counsel of record, subject to the approval of the Court, as follows:

1. Plaintiffs shall serve on Defendants an omnibus memorandum in opposition to Defendants' motions to dismiss by December 12, 2008.
2. Defendants shall serve on Plaintiffs their memoranda in reply to Plaintiffs' opposition memoranda by January 23, 2009.
3. The December 15, 2008, Initial Scheduling Conference before Magistrate Judge Boyle is adjourned pending resolution of Defendants' motions to dismiss the Complaint.

IT IS SO ORDERED

DATED _____

THE HONORABLE THOMAS C. PLATT
UNITED STATES DISTRICT JUDGE

DATED: November 13, 2008
New York, New York

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER
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